

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:

**LEGENDARY FIELD
EXHIBITION, LLC, ET AL,

DEBTORS.**

CASE NO. 19-50900-CAG-7

CHAPTER 7

**COLTON SCHMIDT, INDIVIDUALLY
AND ON BEHALF OF OTHERS
SIMILARLY SITUATED; AND REGGIE
NORTHRUP, INDIVIDUALLY AND ON
BEHALF OF OTHERS SIMILARLY
SITUATED,**

PLAINTIFFS,

**AAF PLAYERS, LLC, THOMAS DUNDON,
CHARLES “CHARLIE” EBERSOL,
LEGENDARY FIELD EXHIBITIONS,
LLC, AAF PROPERTIES, LLC, EBERSOL
SPORTS MEDIA GROUP, INC. AND
DOES 1 THROUGH 200, INCLUSIVE,**

DEFENDANTS.

ADV. PROC. NO. 19-05053

JOINT STATUS REPORT

In response to the Court’s instruction following the hearing on February 8, 2022, Plaintiffs Colton Schmidt and Reggie Northrup, individually and on behalf of others similarly situated, (collectively “Plaintiffs”), Randolph N. Osherow (“Trustee”), the duly appointed Chapter 7 Trustee of the jointly administered bankruptcy estates of AAF Players, LLC (“AAF Players”); Legendary Field Exhibitions, LLC (“LFE”); AAF Properties,

Inc. (“AAF Properties”); and Ebersol Sports Media Group, Inc. (“ESMG”) (collectively, “Debtors”)¹ and Defendant Thomas Dundon (“Dundon”) submit this Joint Status Report:

1. On August 25, 2021, Plaintiffs and now former Defendants Charles Ebersol, AAF Players, LLC, AAF Properties, LLC, Legendary Field Exhibitions, LLC, and Ebersol Sports Media Group, Inc., filed a Joint Motion to (1) Preliminarily Approve the Settlement Agreement; (2) Grant Class Certification Pursuant to Settlement Agreement; (3) Appoint Class Counsel and Class Representatives Pursuant to Settlement Agreement; (4) Approve the Form and Manner of Notice to Class Members; (5) Set a Deadline for Objections to the Settlement; and (6) Schedule a Hearing for the Final Consideration and Approval of the Settlement. Adv. ECF #175.

2. The following day, on August 26, 2021, the Court entered the Order Abating Phase 1 Scheduling Order Deadlines and Setting Status Conference. Adv. ECF #180, abating all deadlines in the adversary proceeding during the pendency of the settlement.

3. On February 8, 2022, the Court held a hearing on the Joint Motion for (1) Final Approval of the Settlement Agreement; (2) Class Certification Pursuant to Settlement Agreement; (3) Appointment of Class Counsel and Class Representatives Pursuant to Settlement Agreement; and (4) Approval of Compensation for Class Counsel

¹ Plaintiffs assigned their right to the recovery of damages against Dundon, specifically for the amounts not paid under the Standard Player Agreements and claims based on Dundon’s obligations or commitments to the Debtors. (Settlement Agreement, Dkt. No. 175-1, pgs.16-17 at ¶15(a)-(b).)

and Service Awards for Class Representatives. Two days later, on February 9, 2022, the Court entered an order formally approving the settlement.

4. During the final settlement hearing, the Court instructed Plaintiffs and Dundon to provide a status report to the Court within 30 days, by March 10, 2022.

5. On March 10, 2022, the Plaintiffs, Trustee, and Ebersol filed a Joint Motion for Entry of Partial Final Judgment Under Federal Rule of Bankruptcy Procedure 7054(a) and Federal Rule of Civil Procedure 54(b) (the "Motion," Dkt. 219), respectfully requesting that this Court enter a Final Judgment, declaring as "final" under Federal Rule of Civil Procedure 54(b) and Federal Rule of Bankruptcy Procedure 7054(a) its Order for (1) Final Approval of the Settlement Agreement; (2) Class Certification Pursuant to Settlement Agreement; (3) Appointment of Class Counsel and Class Representatives Pursuant to Settlement Agreement; and (4) Approval of Compensation for Class Counsel and Service Awards for Class Representatives, Dkt. 215, entered on February 9, 2022 (the "Final Approval Order").

6. The Parties hereby inform the Court as follows:

- Dundon intends to file a motion to dismiss, seeking dismissal of the remaining cases of action asserted against him; and
- The Parties will file a separate scheduling order to conclude Phase 1 of discovery, focusing on class certification issues, by March 18, 2022.

The Parties continue to work together professionally as all parties

understand that there are presently existing circumstances that may impact the availability of courts, witnesses, and attorneys. The Parties continue to work cooperatively to address difficulties that may arise, which the Court and the Parties could not have predicted.

Respectfully submitted,

**PLAINTIFFS COLTON SCHMIDT AND REGGIE NORTHRUP,
INDIVIDUALLY AND ON BEHALF OF OTHERS SIMILARLY SITUATED**

/s/ Jonathon Farahi

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CERTIFICATE OF SERVICE

I certify on March 10, 2022, I served the foregoing document with the counsel of record by electronic means.

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